

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: BISON LAND & MINERALS, LLC
 Debtor**

**CHAPTER 11
CASE NO. 23-01140-JAW**

MOTION FOR EXTENSION OF TIME TO RESPOND TO DISCOVERY REQUESTS

COMES NOW Bison Land & Minerals, LLC (the “Debtor”), and files this its *Motion for Extension of Time to Respond to Discovery Requests* (the “Motion”), and in support thereof, would respectfully show as follows, to-wit:

1. The responses to the First Set of Requests for Production of Documents propounded by Sparrow Oil & Gas, LLC (“Sparrow”), Greg Pollard (“Pollard”) and Kiat “Kenny” Tze Goh (“Goh”) (collectively, the “Sparrow Creditors”) are due on September 14, 2023. The responses to the Requests for Admission and Second Set of Requests for Production of Documents propounded by the Sparrow Creditors are due on September 18, 2023.

2. Because of scheduling conflicts and multiple out-of-town depositions, hearings and meetings, counsel for the Debtor has been unable to confer with his client so as to finalize the responses to the Sparrow Creditors’ discovery requests propounded to the Debtor. He has received initial responses but they are not yet complete.

3. Debtor therefore respectfully requests that it be allowed an additional fourteen (14) days from the date an order is entered granting the Motion to submit its responses to the Sparrow Creditors’ discovery requests.

4. Debtor reserves all objections it may have to the discovery that has been submitted.

5. Other grounds to be assigned upon a hearing hereof if necessary.

WHEREFORE, PREMISES CONSIDERED, Debtor respectfully prays that upon a hearing hereof, this Honorable Court will grant it an additional fourteen (14) days from the date an order is

entered granting the Motion to submit its responses to the Sparrow Creditors' discovery requests.

Debtor prays for general relief.

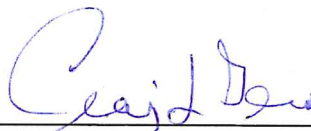
THIS, the 14th day of September, 2023.

Respectfully submitted,

BISON LAND & MINERALS, LLC

By Its Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By: 
Craig M. Geno

OF COUNSEL:

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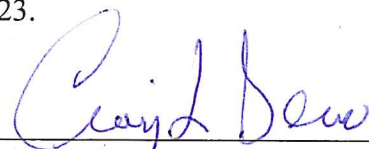
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CERTIFICATE OF SERVICE

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via electronic filing transmission, a true and correct copy of the above and foregoing to the following:

Timothy J. Anzenberger, Esq.
tim.anzenberger@arlaw.com

THIS, the 14th day of September, 2023.


Craig M. Geno